

**JOINT PROPOSED PRETRIAL ORDER**

*Pulliam v. County of Fort Bend, Texas, et al.*

Case No. 4:22-cv-4210

**ATTACHMENT D**

**Defendants' Exhibit List**

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JUSTIN PULLIAM

V.

FORT BEND COUNTY, TEXAS, ET.  
AL.,§  
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CIVIL ACTION NO.: 4:22-CV-4210

**DEFENDANTS' TRIAL EXHIBIT LIST**

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-1	Livestream Video of Jul. 12, 2021 Incident	Published on Plaintiff's YouTube Platform on Jul. 12, 2021			
DX-2	<i>Impeachment Exhibit</i> FBCSO Current Media Distribution List	N/A			
DX-3	FBCSO General Order #05-04 <i>Social Media and Related Communications</i> Effective: Jun. 1, 2017	FBC 001412- FBC 001414 <i>Produced on</i> <i>Jul. 26, 2023</i>			
DX-4	FBCSO General Order #05-04 <i>Social Media and Related Communications</i> Effective: Oct. 1, 2021	FBC 001320- FBC 001322 <i>Produced on</i> <i>Jun. 30, 2023</i>			
DX-5	FBCSO General Order #05-04 <i>Social Media and Related Communications</i> Effective: Feb. 25, 2025	N/A			
DX-6	FBCSO General Order #08-03 <i>Public Information and Media Relations</i> Effective: Jun. 1, 2017	FBC 001404- FBC 001408 <i>Produced on</i> <i>Jul. 26, 2023</i>			
DX-7	FBCSO General Order #08-03 <i>Public Information and Media Relations</i> Effective: Oct. 1, 2021	FBC 001399- FBC 001403 <i>Produced on</i> <i>Jul. 26, 2023</i>			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-8	FBCSO General Order #08-03 <i>Public Information and Media Relations</i> Effective: Dec. 29, 2022	FBC 001394- FBC 001398 <i>Produced on</i> <i>Jul. 26, 2023</i>			
DX-9	<i>Impeachment Exhibit</i> Livestream Video Taken On Oct. 2, 2023	Published on Plaintiff's YouTube Platform on Oct. 2, 2023			
DX-10	<i>Impeachment Exhibit</i> Livestream Video Taken On Nov. 5, 2023	Published on Plaintiff's YouTube Platform on Nov. 5, 2023			
DX-11	<i>Impeachment Exhibit</i> Livestream Video Taken On Oct. 15, 2024	Published on Plaintiff's YouTube Platform on Oct. 15, 2024			
DX-12	<i>Impeachment Exhibit</i> YouTube Video Published On Mar. 4, 2024	Published on Plaintiff's YouTube Platform on Mar. 4, 2024			
DX-13	<i>Impeachment Exhibit</i> YouTube Video Published On Nov. 7, 2024	Published on Plaintiff's YouTube Platform on Nov. 7, 2024			
DX-14	<i>Impeachment Exhibit</i> YouTube Video Published On Dec. 5, 2024	Published on Plaintiff's YouTube Platform on Dec. 5, 2024			
DX-15	<i>Impeachment Exhibit</i> 911 Call Related to Dec. 21, 2021 Arrest	State's Ex. 2 in Criminal Trial <i>Disclosed by State on</i> <i>Mar. 28, 2023 –</i> <i>Mar. 30, 2023</i>			
DX-16	Detailed History for Police Event #P213550380	FBC 001131 - FBC 001134 <i>Produced on</i> <i>Jun. 30, 2023</i>			
DX-17	FBCSO Offense Report No. 21-50632	FBC 001113- FBC 001130 <i>Produced on</i> <i>Jun. 30, 2023</i>			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-18	Edwin Kraft Emergency Transport Log	FBC 001135 <i>Produced on Jun. 30, 2023</i>			
DX-19	Edwin Kraft Indictment for Aggravated Assault of a Public Servant <i>The State of Texas v. Edwin Kraft</i>	FBC 001142 <i>Produced on Jun. 30, 2023</i>			
DX-20	Audio Recording of Edwin Kraft Apprehension on Dec. 21, 2021	FBC 001198 <i>Produced on Jun. 30, 2023</i>			
DX-21	Edwin Kraft Mugshot	State's Ex. 1 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-22	Aerial Photograph of Kraft Gas Station	State's Ex. 5 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-23	Aerial Photograph of Kraft Gas Station	State's Ex. 6 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-24	Photograph of Kraft Mobile Home	State's Ex. 7 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-25	Photograph of Kraft Gas Station and Kraft Mobile Home	State's Ex. 8 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-26	Photograph of Perimeter Fence at Kraft Gas Station and Mobile Home	State's Ex. 9 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-27	Photograph of Kraft Mobile Home	Sate's Ex. 11 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-28	Photograph of Kraft Mobile Home	Sate's Ex. 10 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-29	Photograph of Kraft Mobile Home	Sate's Ex. 12 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-30	Photograph of Kraft Gas Station	Sate's Ex. 14 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-31	Photograph of Business Across from Kraft Gas Station	Sate's Ex. 15 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-32	Photograph of Business Across from Kraft Gas Station	Sate's Ex. 16 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-33	Photograph of Kraft Gas Station	Sate's Ex. 17 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-34	Photograph of Kraft Gas Station	Sate's Ex. 18 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-35	Google Maps Image of Kraft Gas Station	Defendant's Ex. 1 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-36	Aerial Image of Kraft Gas Station	Defendant's Ex. 2 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-37	Justin Pulliam Dash-Cam Video of Dec. 21, 2021 Arrest	Defendant's Ex. 3/4 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-38	Justin Pulliam Body-Cam Video of Dec. 21, 2021 Arrest	Defendant's Ex. 3/4 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-39	Justin Pulliam Handheld-Cam Video of Dec. 21, 2021 Arrest	Defendant's Ex. 3/4 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-40	FBCSO Offense Report No. 21-50633	FBC 001336- FBC 001362 <i>Produced on Jun. 30, 2023</i>			
DX-41	Plaintiff's Original Complaint ECF No. 1 filed on Dec. 5, 2022	Filed with this Court on Dec. 5, 2022			
DX-42	Plaintiff's First Amended Complaint ECF No. 33 filed on Feb. 13, 2023	Filed with this Court on Feb. 13, 2023			
DX-43	<i>Impeachment Exhibit</i> Excerpt of Justin Pulliam Deposition Testimony on Aug. 11, 2023	Deposition taken on Aug. 11, 2023			
DX-44	Texas Penal Code Section 38.15	N/A			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-45	Indictment for Case No. 22-000112 <i>The State of Texas v. Justin Pulliam</i>	File with the 434th Judicial District Court on May 16, 2022			
DX-46	Charge of Court for Case No. 22-000112 <i>The State of Texas v. Justin Pulliam</i>	Filed with the Fort Bend County Court at Law No. 3 on Mar. 30, 2023			
DX-47	Jury Questions for Case No. 22-000112 <i>The State of Texas v. Justin Pulliam</i>	Filed with the Fort Bend County Court at Law No. 3 on Mar. 30, 2023			
DX-48	Motion to Dismiss for Case No. 22-000112 <i>The State of Texas v. Justin Pulliam</i>	Filed with the Fort Bend County Court at Law No. 3 on May 14, 2024			
DX-49	Department Wide Warning(s) Issued Regarding Edwin Kraft	FBC 001363- FBC 001381 <i>Produced on Jun. 30, 2023</i>			
DX-50	FBCSO Offense Report No. 20-33646	FBC 000916- FBC 000919 <i>Produced on Jun. 30, 2023</i>			
DX-51	Detailed History for Police Event #P202570218	FBC 000920- FBC 000923 <i>Produced on Jun. 30, 2023</i>			
DX-52	FBCSO Offense Report No. 21-47345	FBC 001033- FBC 001055 <i>Produced on Jun. 30, 2023</i>			
DX-53	Detailed History for Police Event #P213320345	FBC 001056- FBC 001058 <i>Produced on Jun. 30, 2023</i>			
DX-54	Detailed History for Police Event #P213340509	FBC 001068- FBC 001069 <i>Produced on Jun. 30, 2023</i>			

No.	Description	Bates Label(s) / Method of Disclosure	Date Offered	Date Admitted	Date Excluded
DX-55	Detailed History for Police Event #P213320655	FBC 001075- FBC 001076 <i>Produced on Jun. 30, 2023</i>			
DX-56	Detailed History for Police Event #P213340388	FBC 001077 <i>Produced on Jun. 30, 2023</i>			
DX-57	Detailed History for Police Event #P213350572	FBC 001078- FBC 001079 <i>Produced on Jun. 30, 2023</i>			
DX-58	Edwin Kraft Indictment for Stalking <i>The State of Texas v. Edwin Kraft</i>	FBC 001090- FBC 001091 <i>Produced on Jun. 30, 2023</i>			
DX-59	Dep. Ricky Rodriguez Dash-Cam Video of Dec. 21, 2021 Arrest	State's Ex. 13 in Criminal Trial <i>Disclosed by State on Mar. 28, 2023 – Mar. 30, 2023</i>			
DX-60	<i>Impeachment Exhibit</i> YouTube Video Published On Feb. 10, 2025	Published on Plaintiff's YouTube Platform on Feb. 10, 2025			



Respectfully submitted,

Bridgette Smith-Lawson  
Fort Bend County Attorney

By: /s/ Kevin T. Hedges

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ATTORNEYS FOR DEFENDANTS  
FORT BEND COUNTY, TEXAS, SHERIFF  
ERIC FAGAN, AND LIEUTENANT TAYLOR  
ROLLINS

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on the parties and counsel identified on the attached service list by electronic service on this the 1st day of July, 2025.

/s/ Kevin T. Hedges

Kevin T. Hedges

### SERVICE LIST

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